



Federal Communications Commission
Washington, D.C. 20554

June 18, 2010

DA 10-1093

Via First-Class Mail and E-mail

Michael H. Hammer, Esquire
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A. Richard Metzger, Jr., Esquire
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David H. Solomon, Esquire
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Re: Applications of Comcast Corporation, General Electric Company and NBC Universal, Inc. For Consent to Assign Licenses or Transfer Control of Licensees, MB Docket No. 10-56; Response to Request for Clarification and Correction of Letter Order Granting Supplemental Request for Enhanced Treatment of Highly Confidential Documents

Dear Messrs. Hammer, Metzger and Solomon:

By your June 14, 2010 letter ("Revised Confidentiality Request"), on behalf of your respective clients, Comcast Corporation ("Comcast"), General Electric Company ("GE"), and NBC Universal, Inc. ("NBCU"), you reference your joint letter of June 8, 2010, supplemented by your separate letters dated June 10, 2010 filed on behalf of Comcast and NBCU (collectively, "Confidentiality Request"). In the *Confidentiality Request*, filed pursuant to the terms of the *Second Protective Order*,¹ you requested enhanced confidential treatment for certain information and documents provided in your clients' respective responses to the Media Bureau's Information and Discovery Requests ("IDR") sent to Comcast and to NBCU on May 21, 2010. By letter dated June 11, 2010 ("Letter Order"), subject to certain limitations, the Media Bureau granted the *Confidentiality Request*.² Subject to the limitations set forth in the *Second Protective Order* and the *Letter Order*, the Media Bureau hereby revises the *Letter Order*, as discussed below.

¹ *Applications of Comcast Corporation, General Electric Company and NBC Universal, Inc. For Consent to Assign Licenses or Transfer Control of Licensees*, MB Docket No. 10-56, Second Protective Order, 25 FCC Rcd 2140 (MB 2010) ("Second Protective Order").

² Letter from William T. Lake, Chief, Media Bureau to Michael H. Hammer, Esquire, Willkie Farr & Gallagher LLP, A. Richard Metzger, Jr., Esquire, Lawler, Metzger, Keeney & Logan, LLC and David H. Solomon, Esquire, Wilkinson Barker Knauer, LLP, DA 10-1068 (June 11, 2010).

In the *Revised Confidentiality Request*, you state that your *Confidentiality Request* inadvertently omitted Comcast IDR number 6.h and NBC IDR number 53 from the respective IDR responses identified as falling into certain categories of information for which they were requesting confidentiality protection under the *Second Protective Order*. You specifically explain why your clients' respective IDR responses to Comcast IDR number 6.h and NBC IDR number 53 should be included in the categories of information eligible for Highly Confidential Treatment identified in the *Letter Order* and request such treatment for them.

In the *Revised Confidentiality Request*, you also identify Comcast IDR number 10 and NBC IDR number 21 as having been inadvertently omitted from respective IDR responses included in certain categories of information eligible for Highly Confidential Treatment discussed in the *Letter Order*, although you had included them in your *Confidentiality Request*. You reiterate the reasons provided in the *Confidentiality Request* why your clients' respective IDR responses to Comcast IDR number 10 and NBC IDR number 21 should also be included in the categories of information eligible for Highly Confidential Treatment identified in the *Letter Order*.

We agree that each of the above items falls within the respective categories of information discussed in the *Confidentiality Request* for which you sought confidentiality protection under the *Second Protective Order*. Accordingly, by this letter, we hereby revise the *Letter Order* issued in response to the *Supplemental Confidentiality Request* and accordingly replace Sections C, E, I and K of the *Letter Order* with the revised language below, which includes the information provided in the aforementioned four IDR responses. For purposes of clarity, the revised terms are marked in bold.

Categories Eligible for Highly Confidential Treatment

...

C. Comcast's Video Programming and Carriage Agreement Terms and Conditions:

(i) Information relating to the details of video programming and carriage agreements, programming rights, retransmission agreements, linear carriage agreements, video-on-demand agreements, and online distribution agreements, including information regarding the details of the negotiation for such agreements; analyses of such agreements or negotiations.

Comcast's responses to Comcast IDR numbers: **6.h**, 10, 20-21; 23-24; 32; 41-42; 44; 46 and 51-52 may include information that falls within this category of documents and information that is eligible for Highly Confidential Treatment.

E. Comcast Advertising Sales, Financial and Operating Results:

(i) Detailed information regarding advertising revenues and expenses, including expenses relating to the development of advanced advertising platforms, disaggregated by expense and by business unit, network, distributor, cable systems and other entities.

Comcast's responses to Comcast IDR numbers: 6.j; 26.c; **10**; and 48 may include information that falls within this category of documents and information that is eligible for Highly Confidential Treatment.

I. NBCU's Video Programming and Carriage Agreement Terms and Conditions:

(i) Information relating to the details of video programming and carriage agreements, programming rights, retransmission agreements, linear carriage agreements, video-on-demand agreements, and online distribution agreements, including information regarding the details of the negotiation for such agreements; analyses of such agreements or negotiations.

NBCU's responses to NBCU IDR numbers: 5; 18.c; 19.c; 24-40; 45-48; and **52-57** may include information that falls within this category of documents and information that is eligible for Highly Confidential Treatment.

K. NBCU's/GE's Current and Forward-Looking Business Strategies and Plans:

(i) Information relating to current and forward-looking business strategies and marketing plans, including detailed business models and projections, divestiture strategies and plans relating to the proposed Comcast-NBCU joint venture.

NBCU's responses to NBCU IDR numbers: **21**, 23; 26; 28-32; 39-41; 45; 48; 50-51 and 59 may include information that falls within this category of documents and information that is eligible for Highly Confidential Treatment.

In all other respects, the Letter Order remains unchanged and in effect.

Sincerely,

William T. Lake
Chief, Media Bureau